UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF NEW YORK

Х

SOHEILA HEXEMER, :

Index No. 12-cv-1808 (LEK/CFH)

Plaintiff.

NOTICE OF MOTION FOR SUMMARY JUDGMENT

GENERAL ELECTRIC COMPANY, GID GLOBAL, LLC and JOSE GARCIA, in his professional and individual capacities,

v.

Defendants.

PLEASE TAKE NOTICE that upon the attached Declaration of David G. Ebert, sworn to December 12, 2014, and its attached exhibits, the Affidavit of Jose Garcia, sworn to December 11, 2014, and its attached exhibits, the Affidavit of Jared York, sworn to December 12, 2014, and its attached exhibits, the attached Rule 7.1(a)(3) Statement of Undisputed Material Facts, and the accompanying memorandum of law, defendants General Electric Company, GID Global, LLC, and Jose Garcia ("Defendants") will move this Court before the Honorable Lawrence E. Kahn at the James T. Foley U.S. Courthouse, 445 Broadway, Albany, NY 12207 on January 16, 2015 at 9:30 a.m., or as soon thereafter as Defendants can be heard, for an order granting Defendants summary judgment, pursuant to F.R.C.P. 56, disposing of the claims asserted against the Defendants: retaliation under 42 U.S.C. § 1981, retaliation under Title VII (42 U.S.C. § 2000e et seq.), and retaliation under N.Y.S.H.R.L.

Dated: New York, New York December 12, 2014

INGRAM YUZEK GAINEN CARROLL & BERTOLOTTI, LLP

By: __s/ David G. Ebert_

David G. Ebert (debert@ingramllp.com)
Christina Y. Kim (ckim@ingramllp.com)

Attorneys for Defendants 250 Park Avenue New York, NY 10177 T. (212) 907-9600 F. (212) 907-9681